

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

CARRILLO HUETTEL LLP, ET AL.,

Defendants,

**1:13-cv-01735 (GBD)
ECF CASE**

**DECLARATION OF TODD BRODY IN FURTHER SUPPORT
OF PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT**

I, Todd D. Brody, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge:

1. I am a member of the bar of this Court and an attorney for Plaintiff Securities and Exchange Commission (the "Commission"). I make this Declaration in further support of the Commission's application for a default judgment pursuant to Rule 55.1 of the Civil Rules for the Southern District of New York and Fed. R. C. P. 55(a) against defendants Luis J. Carrillo ("Carrillo") Wade Huettel ("Huettel"), Carrillo Huettel LLP ("Carrillo Huettel"), Luniel De Beer ("De Beer"), Warren Davis ("Davis"), and Gibraltar Global Securities, Inc. ("Gibraltar").

2. I make this Declaration based on first-hand knowledge, information and belief. The sources of my information and the basis of my belief are documents and records obtained and reviewed by me.

3. Attached hereto as Exhibit A is a true and correct copy of an email exchange between counsel for the Commission and counsel for Dr. Carrillo where the Commission requested that Dr. Carrillo appear voluntarily for a deposition. Dr. Carrillo would not agree to appear voluntarily, requiring the Commission to seek his deposition pursuant to the Hague Convention.

4. Attached hereto as Exhibit B are true and correct copies of letters submitted on Dr. Carrillo's behalf to the Court in Mexico explaining why, for medical reasons, Dr. Carrillo could not be deposed.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 10, 2016
New York, New York

/s/ Todd D. Brody
Todd D. Brody
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